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UBER TECHNOLOGIES, INC.
17 and OTTOMOTTO LLC

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 WAYMO LLC,
22 Plaintiff,
23 v.
24 UBER TECHNOLOGIES, INC.,
25 OTTOMOTTO LLC; OTTO TRUCKING LLC,
26 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
MICHELLE YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
THEIR OPPOSITION TO WAYMO'S
MOTION TO COMPEL UBER
SOURCE CODE**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Their Opposition to Waymo's Motion To Compel Uber Source Code.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition to Waymo's Motion to Compel ("Opposition")	Highlighted Portions	Defendants (Blue) Plaintiff (Green)
Exhibits 1-4	Entire Documents	Plaintiff
Exhibits 6A and 6B	Entire Documents	Defendants

3. The blue-highlighted portions of the Opposition and the entireties of Exhibits 6A and 6B contain highly confidential information regarding Ottomotto source code. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information could allow competitors to obtain a competitive advantage over Defendants by acquiring details into the source code in Ottomotto's software, such that Defendants' competitive standing could be significantly harmed.

4. The green-highlighted portions of the Opposition and Exhibits 1-4 contain information that has been designated "Highly Confidential – Attorneys' Eyes Only" or "Confidential" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order.

